The subject invention, as claimed, includes "generating motion vectors, each motion vector corresponding to a group of pixels of one image, between a group of pixels of said one image and a second group of pixels of another image in the data-signal", "generating interpolated results as a function of these motion vectors", "estimating the reliability of each motion vector corresponding to a particular group of pixels", "calculating weights as a function of the reliability of the motion vectors", and "generating an interpolated luminous intensity of a group of pixels for an interpolated image by calculating, on the basis of these weights, a weighted average of the interpolated results".

Applicants submit that while Nakajima arguably discloses generating motion vectors, estimating the reliability of each motion vector (note that the motion vectors from the motion vector estimators 31-3n include prediction error signals E1-En), and calculating weights as a function of the reliability of the motion vectors, Nakajima neither discloses or suggests "generating interpolated results as a function of these motion vectors", and "generating an interpolated luminous intensity of a group of pixels for an interpolated image by calculating, on the basis of these weights, a weighted average of the interpolated results".

The Examiner indicates that the "generating interpolated results as a function of these motion vectors" is disclosed in Nakajima "note that motion vectors V1...Vn are then inputted to

element 43 outputs the best interpolated results, along with results from elements 41 and 42 that incorporates the weights E1...En into element 43". However, Applicants would like to point out that element 43 is a selector for selecting one of the motion vectors V1-Vn applied thereto. This selection is based on the handicapping (weighting) of the prediction error signals E1-En in the preprocessor 41 and the selection of one of the handicapped prediction error signals in the comparator 42. Hence, there is no interpolation performed on the motion vectors. Further, Applicants submit that the "generating interpolated results as a function of these motion vectors" concerns an interpolated luminance value, and not an interpolated motion vector. This is made more evident in the step "generating an interpolated luminance intensity of a group of pixels for an interpolated image by calculating, on the basis of these weights, a weighted average of the interpolated results." Applicants submit that Nakajima neither discloses nor suggests anything related to generated an interpolated luminance intensity based on the weights of the motion vectors, by calculating a weighted average of the interpolated results each obtained as a function of the motion vectors.

Applicants would like to point out to the Examiner that Nakajima, and in particular, the embodiment of Fig. 20, relates to a motion estimator and that the resulting output of the circuit is

a motion vector. There is no disclosure in Nakajima of interpolating luminance based on the motion vectors.

In view of the above, Applicants believe that the subject invention, as claimed, is neither anticipated nor rendered obvious by the prior art, and as such, is patentable thereover.

Applicants believe that this application, containing claims 1-7, is now in condition for allowance and such action is respectfully requested.

Respectfully submitted,

Edward W. Goodman, Reg. 28,613

Attorney

Tel.: 914-333-9611

CERTIFICATE OF MAILING

It is hereby certified that this correspondence is being deposited with the United States Postal Service as First-class mail in an envelope addressed to:

COMMISSIONER OF PATENTS AND TRADEMARKS
P.O. BOX 1450
ALEXANDRIA, VA 22313-1450

on January 20, 2005

By Swrett James